

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FTX TRADING LTD., <i>et al.</i> ¹)	Case No. 22-11068 (JTD)
)	
Debtors.)	(Lead Case)
)	
)	(Jointly Administered)
)	

**NOTICE OF EMERGENT DEBTOR'S SECOND MOTION
FOR ENTRY OF AN ORDER EXTENDING THE EXCLUSIVE
PERIODS DURING WHICH ONLY THE EMERGENT DEBTOR
MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

PLEASE TAKE NOTICE that on November 20, 2023, Emergent Fidelity Technologies Ltd, as debtor and debtor-in-possession, filed the *Emergent Debtor's Second Motion for Entry of an Order Extending the Exclusive Periods During Which Only the Emergent Debtor May File a Chapter 11 Plan and Solicit Acceptances Thereof* (the "Motion") in the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion has been scheduled for **December 12, 2023, at 10:00 a.m., prevailing Eastern Time** before the Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that any responses to the relief requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

Local Rules for the United States Bankruptcy Court for the District of Delaware, and all General Orders applicable to the above-referenced chapter 11 case; (c) be filed electronically with the Court on the docket of *In re FTX Trading Ltd.*, Case No. 22-11068 (JTD), by registered users of the Court's electronic filing system and in accordance with the applicable General Orders (available on the Court's website at <http://www.deb.uscourts.gov>) **by December 5, 2023 at 4:00 p.m., prevailing Eastern Time** (the "Objection Deadline"); and (d) be promptly served on the following parties: (i) counsel to the Debtor, Morgan, Lewis & Bockius LLP, 2222 Market Street, Philadelphia, PA 19103, Attn: Matthew C. Ziegler (matthew.ziegler@morganlewis.com) and David K. Shim (david.shim@morganlewis.com), (ii) the Office of the United States Trustee for Region 3, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Jon Lipshie (Jon.Lipshie@usdoj.gov), and (iii) all entities that requested notice in the Emergent Chapter 11 Case under Fed. R. Bankr. P. 2002.

PLEASE TAKE FURTHER NOTICE that if no responses to the Motion are timely filed, served, and received in accordance with this Notice, the Court may grant the relief requested in the Motion without further notice or hearing.

Dated: November 20, 2023
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

Jody C. Barillare (Bar No. 5107)
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: (302) 574-3000
Email: jody.barillare@morganlewis.com

- and -

John C. Goodchild, III (admitted *pro hac vice*)
Matthew C. Ziegler (admitted *pro hac vice*)
1701 Market Street
Philadelphia, PA 19103
Telephone: (215) 963-5000
Email: john.goodchild@morganlewis.com
Email: matthew.ziegler@morganlewis.com

- and -

Craig A. Wolfe (admitted *pro hac vice*)
Joshua Dorchak (admitted *pro hac vice*)
David K. Shim (admitted *pro hac vice*)
101 Park Avenue
New York, NY 10178
Telephone: (212) 309-6000
Email: craig.wolfe@morganlewis.com
Email: joshua.dorchak@morganlewis.com
Email: david.shim@morganlewis.com

*Counsel for Emergent Fidelity
Technologies Ltd as Debtor and Debtor-in-
Possession*